



Archaeological Desk Based Assessment

Richmond-upon-
Thames College
Redevelopment

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Executive Summary

This archaeological and heritage assessment has been prepared by Archaeology Collective, on behalf of Clarion Housing Group Limited, to inform planning proposals for residential development at Richmond-upon-Thames College.

The report has confirmed that the application site does not contain any designated heritage assets such as world heritage sites, scheduled monuments, registered parks and gardens, registered battlefields or listed buildings, where there would be a presumption in favour of their physical preservation in situ and against development.

The Site is not located within an Archaeological Priority Area and there are no previously recorded non-designated heritage assets within the boundary of the Site.

A review of historic mapping has indicated that the Site has remained as undeveloped land until the relocation of Marsh Farm and construction of tramways in the mid-19th century and the subsequent construction of Twickenham Technical College.

The construction of the previous buildings on the Site is considered to have had impacts upon sub-surface deposits, some of which may have had the potential to contain archaeological deposits. The proposed development has the potential to have further effects on archaeological deposits which may survive within parts of the Site. In this instance, this would tend to be beside previous ground disturbance (e.g. adjacent to existing footings) and in areas such as courtyards or lawns, where previous disturbance is lighter.

It is considered that there is medium to negligible potential for archaeological deposits to survive within the Site.

It is considered that the Site is unlikely to contain any extensive archaeological deposits of high significance or value which would require preservation in situ.

The conclusions of this assessment and in particular the recommendations in respect of the determination of the planning application, are in accordance with both local and national planning policy.

1.0

1. Introduction

Project Background

- 1.1** This archaeological desk-based assessment has been prepared by Rebecca Ryan BA (Hons) ACIfA, Archaeological Consultant at Archaeology Collective on behalf of Clarion Housing Group Limited. Documentary research was carried out by the author.
- 1.2** The subject of this assessment is the site known as Richmond-upon-Thames College **hereafter referred to as the 'Site'** (Figure 1). The area which the Site occupies is approximately 2.1ha and is centred at National Grid Reference (NGR) TQ 15415 73735. Administratively, for local government purposes, the Site lies in the London Borough of Richmond upon Thames.
- 1.3** The purpose of this assessment is to determine and assess the archaeological potential of the Site informed by available historical information and data on designated and non-designated heritage assets in order to provide sufficient information for the Local Planning Authority to come to an informed understanding of the potential impact of the proposed development proposal on the significance of those assets.
- 1.4** In addition, the assessment enables stakeholders to assess the archaeological potential of the Site and to consider the need for design, civil engineering and archaeological solutions to the potentials identified where appropriate.
- 1.5** The report considers only designated and non-designated heritage assets of archaeological interest as recorded in statutory or non-statutory repositories of historic environment data. This may include, but is not limited to:
- Finds/findspots of artefactual material (e.g. stone tools);
 - Finds/findspots of ecofactual material (e.g. animal bone);
 - Locations, features or objects referenced from historic documents;
 - Archaeological or palaeoenvironmental deposits;
 - Sub surface archaeological remains of features, buildings or structures;
 - Scheduled monuments; and
 - Registered Battlefields

1.6 The report will not address designated or non-designated built heritage. Specifically:

- Listed buildings;
- Conservation areas;
- Registered Parks and Gardens; and
- Locally listed buildings.

1.7 The Site is formed by part of the Richmond-upon-Thames College campus.

1.8 Clarion Housing Group Limited have commissioned Archaeology Collective to establish the archaeological potential of the site, to identify any particular areas of archaeological potential or significance and to provide guidance on ways to accommodate any relevant constraints identified. This assessment is in accordance with the National Planning Policy Framework (NPPF) and the procedures set out in CIfA's '**Standard and Guidance for Historic Environment Desk-based Assessment**'¹.

1.9 This desk-based assessment comprises an examination of digital data held by the Greater London Historic Environment Record (GLHER) together with documentary research. The report incorporates the results of a comprehensive map regression exercise in order to review the impacts of existing and previous development on potential underlying archaeological deposits. Consultation of additional sources has been undertaken where necessary.

1.10 This data has been collected for an area comprising a 500m radius of the Site **boundary; the 'study area'**. **This radius has been selected on the** basis of professional judgement to be appropriate to determining the archaeological potential of the Site given its location and character.

Geology

1.11 The British Geological Survey identifies the solid geology as London Clay Formation – Clay and Silt, a sedimentary bedrock formed in Palaeogene Period which indicates a local environment previously dominated by deep seas. The solid geology is overlain by superficial deposits of Kempton Park Gravel Member – Sand and Gravel, which were formed in the Quaternary Period and are indicative of local environment previously dominated by rivers² (Figure 2).

1.12 There is no site specific geotechnical information currently available for the Site or surrounding area.

¹ CIfA. Standard and Guidance for Historic Environment Desk-based Assessment 2017

² British Geological Society Online Viewer

Topography

- 1.13** The Site is located c.12-13m above Ordnance Datum (aOD) along its western boundary, rising to c.13-16m aOD along its eastern boundary (Figure 3).

Site Visit

- 1.14** A site walkover survey was undertaken on the 7th November 2018.
- 1.15** The Site is formed by buildings of the Richmond-upon-Thames College, although **there is a courtyard towards the eastern portion of the Site and 'open' areas along the eastern and southern boundaries.** The Site is largely level, although there were some indications of some terracing. However, it was noted that the Plant Room, along the northern boundary of the Site, was c.2m below the level of the rest of the buildings and the land around it.
- 1.16** The following photographs are a selection of those taken during the visit:



Photograph 1: Facing across courtyard.



Photograph 2: Facing along eastern boundary.



Photograph 3: Facing across southern boundary.



Photograph 4: Facing into Plant Room.

2.0

2. Archaeological and Historical Background

Introduction

- 2.1** The Site does not contain any designated heritage assets, such as scheduled monuments or registered battlefields for which there would be a presumption in favour of preservation *in situ* and against development proceeding.
- 2.2** There are no known non-designated heritage assets within the Site, and four within the 500m study area.

Non-Designated Heritage Assets

- 2.3** This section considers the archaeological finds and features from within the 500m study area, held within the HER, together with a map regression exercise charting the history of the site from the 18th century to the present day.
- 2.4** Timescales used in this section:

Prehistoric

Palaeolithic	450,000	- 12,000	BC
Mesolithic	12,000	- 4,000	BC
Neolithic	4,000	- 1,800	BC
Bronze Age	1,800	- 600	BC
Iron Age	600	- AD 43	

Historic

Roman	AD	43	- 410
Saxon/Early Medieval	AD	410	- 1066
Medieval	AD	1066	- 1485
Post Medieval	AD	1486	- 1800
Modern	AD	1800	- Present

2.5 The HER map and list are included in this report at Appendix 3, showing the distribution of entries within the 500m study area.

Archaeological Priority Areas

2.6 The Site is not located within an Archaeological Priority Area (APA), however, there are three APAs recorded within the study area. The Crane Valley APA (DLO33459) has been designated as such in relation to gunpowder manufacture and other industries, the Twickenham and Marble Hill APA (DLO33460) has been designated **as such in relation to the area’s early medieval settlement and the Whitton APA (DLO33470) has been designated as such in relation to the area’s medieval settlement.**

2.7 An APA is a defined area where there is significant known archaeological interest or particular potential for new archaeological discoveries, based on existing information. The Historic England Greater London Archaeology Advisory Services (GLAAS) categorises APAs into a tier system, which vary depending on the archaeological significance and potential of the APAs. However, the APAs within the London Borough of Richmond upon Thames are currently being reviewed in accordance with the new APA Guidelines and therefore have not yet been given a tier rating.

Prehistoric

2.8 The GLHER holds no records of prehistoric date for within the study area.

- 2.9** The Palaeolithic period is considered as the earliest period of known human culture, although very little evidence of Palaeolithic activity survives beyond residual finds of flint artefacts, usually found along river terraces. Although there are no assets of Palaeolithic date recorded within the study area, evidence from the wider area includes an assemblage of animal bones, which had been cracked indicating a potential human presence, although no tools were found, and plant and molluscan remains.³
- 2.10** Evidence of Mesolithic activity is also limited to similar finds and flint tools as the Palaeolithic, although other bone and antler artefacts have been recovered from the Thames,⁴ as well as a small assemblage of struck flints, flint implements and waste material⁵ identified to the south east of the Site.
- 2.11** The Neolithic period in general was a period of increasing settlement and is characterised by the development of early farming communities and the introduction of large scale burial monuments, although evidence of domestic settlements are rarely identified in the Greater London area.⁶ Archaeological excavations c.967m to the south east of the Site identified a linear feature containing struck flints and early Neolithic pottery.⁷
- 2.12** Throughout the Bronze Age, and onwards into the Iron Age, the landscape became increasingly organised as a recognisable agricultural landscape. A possible Bronze Age boundary of enclosure ditch, cut by another possible ditch at its eastern end⁸ was excavated c.1.1km to the south east of the Site. Evidence of Iron Age activity in the wider area is indicated by a small hoard of nine tin coins, identified on Eel Pie Island, to the south east of the Site.⁹
- 2.13** The Site is located c.1km to the north of the River Thames, along which were located islands, or aits, the largest surviving of which is Eel Pie Island. These islands would have been ideal locations for hunting and fishing, as the land on the margins of the river and its aits would have been a suitable habitat for plants and animals, whilst the river would have been a source of fish, as well as acting as a communication route.¹⁰

³ Cowie 2001: 246

⁴ Nixon et. al 2002: 20

⁵ Cowie 2001: 247

⁶ Nixon et. al 2002: 23

⁷ Cowie 2001: 246

⁸ Cowie 2001: 248 & 250

⁹ Cowie 2001: 250

¹⁰ Cowie 2001

2.14 There are no assets of prehistoric date recorded within the study area, and whilst the wider area was utilised during this period, the focus of this activity lay outside of the study area, towards the River Thames and its associated islands or aits.

2.15 The potential for archaeological deposits of prehistoric date is considered to be negligible.

Roman

2.16 The GLHER holds no records of Roman date for within the study area, and although evidence of Roman activity has been recorded within the wider area, including a possible farmstead¹¹ at Ham Fields, c. 1.1km to the south east, the focus of Roman activity within the London area is located with the north east and it is likely that the Site formed part of the wider hinterland of this settlement.

2.17 The potential for archaeological deposits of Roman date is considered to be negligible.

Saxon/Early Medieval

2.18 The GLHER holds no records of Saxon/early medieval date within the Site and one within the study area; part of the Whitton Brook (GLHER: MLO101207), which forms part of the boundary between the boroughs of Richmond and Hounslow.

2.19 It is thought that a settlement had developed in Twickenham by AD 704¹², but this was focussed on the higher ground, outside of the study area, to the south east. The place-name 'Twickenham' likely refers to land on a river-bend belonging to a man called *Twicca*.¹³ It is likely that the Site was open land during the Saxon/early medieval period.

2.20 Therefore the potential for Saxon/early medieval archaeology is considered to be negligible.

Medieval

2.21 The GLHER holds no records of medieval date for within the study area.

¹¹ Cowie & Eastmond 1997: 90

¹² <https://www.british-history.ac.uk/vch/middx/vol3/pp139-147>

¹³ Mills 2011: 470

- 2.22** Although Twickenham was not recorded in the Domesday Survey, the area formed part of the Manor of Isleworth, which was assessed as a very large area.¹⁴ However, it is thought that Twickenham included approximately 25 households at the time of the survey.¹⁵
- 2.23** It is considered that the Site continued to be open land during this period, and the focus of medieval activity lay outside of the study area, towards the centre of Twickenham.
- 2.24** The potential for medieval archaeological remains is considered to be negligible.

Post Medieval & Modern

- 2.25** The GLHER holds no records for post-medieval and modern assets within the Site and two within the study area.
- 2.26** By the post-medieval period, Twickenham had developed into an area of contrasts, including the houses of gentry, rural areas and the poorer areas.
- 2.27** Drainage channels and subsoil associated with 19th century orchards shown on historic mapping (GLHER MLO109507) were identified during archaeological evaluation.
- 2.28** The earliest map showing the Site included in this assessment is **Rocque's 1761** map (Figure 7), which shows the majority of it as open land, although the western boundary of the Site is shown as part of a road, orientated roughly north to south. The 1804 Ordnance Survey drawing (Figure 8) also shows the Site as open land, and the removal of the road, as does the 1845 tithe map (Figure 9), which also depicts a pond in the centre of the Site.
- 2.29** The 1865 Ordnance Survey (OS) map (Figure 10) shows the Site in more detail, although it is still shown as open land, with a pond connected to Marsh Farm, shown to the south of the Site, by a ditch. A footpath also cuts through the south western corner of the Site. The 1896 OS map (Figure 11) shows the expansion and apparent relocation of Marsh Farm, further to the north of the River Crane, and the route of a tramway orientated roughly east to west, along the northern half of the Site, connecting to Marsh Farm. The routes of other tramways are also shown on the map.

¹⁴ <http://opendomesday.org/place/TQ1675/isleworth/>

¹⁵ London Borough of Richmond upon Thames n.d.: 6

- 2.30** Kneller Gardens (GLHER MLO102892) was developed as a recreation and sports area in 1930 from farmland.
- 2.31** The 1935 OS map (Figure 12) shows little change to the Site, although the route of the tramway is depicted as path or trackway. The largest change to the Site is the construction of the Twickenham Technical College, shown on the 1961 OS map (Figure 13).
- 2.32** Evidence dating to the post-medieval and modern periods indicates that the study area gradually continued to develop these periods. The map regression indicates that the majority of the Site remained as undeveloped land until the relocation of Marsh Farm and construction of tramways in the mid-19th century and the subsequent construction of Twickenham Technical College in the modern period.
- 2.33** The potential for archaeological deposits of post-medieval and modern date is considered to be medium. Any archaeological deposits are likely to relate to the buildings and tramways which once stood on the Site and be of low significance.

Undated

- 2.34** There is one asset of unknown date recorded within the study area, which is the site of an enclosure (GLHER MLO25002).

Previous Archaeological Work

- 2.35** The GLHER holds records for six investigations within the study area, none of which are located within the Site. There have been three intrusive investigations, including a geoarchaeological evaluation, two trial trench excavations and a watching brief. The remaining records relate to a field survey and a desk-based assessment. None of these events recorded noteworthy archaeological remains, and some of the archaeological remains identified as a result of the events correspond with other HER records within the study area.

3.0

3. Proposed Development and Potential Effects

Proposed Development

- 3.1** The proposed development comprises the redevelopment of the Site for residential purposes. At the time of the production of this report, no foundation or section plans were available, therefore it is not known if basements are proposed.

Potential Effects

Designated Heritage Assets

- 3.2** There are no designated heritage assets recorded within the study area which will be impacted by the proposed development. Therefore, it is considered that the proposed development will not affect the significance of such monuments, or the ability to appreciate their significance.
- 3.3** This report does not consider built heritage assets.

Non-Designated Heritage Assets

- 3.4** Based on the information within the HER, supplemented by historic mapping and documentary research, it is considered that the majority of the Site remained as undeveloped land, until the relocation of Marsh Farm and construction of tramways in the mid-19th century and the subsequent construction of Twickenham Technical College. This is considered to have had a previous impact upon any archaeological deposits within parts of the Site. Certain parts of the Site (e.g. the Plant Room, Photograph 4 this document) are located at least 1m below existing ground level and all archaeological potential is likely to have been removed in such locations). However, the green areas along Egerton Road (eastern boundary of the Site), the northern boundary of the Site and within the courtyard, are less likely to have been previously impacted.
- 3.5** The proposed development has the potential to have effects on archaeological deposits which may survive within the Site. In this instance, this would tend to be beside previous ground disturbance (e.g. adjacent to existing footings) and in areas such as courtyards or lawns, where previous disturbance is probably less extensive.

4.0

4. Conclusions

- 4.1** Development proposals for the site known as Richmond-upon-Thames College Redevelopment comprise the redevelopment of the Site for residential purposes.
- 4.2** In line with the policies of the local planning authority and national government guidance as set out in the NPPF, an archaeological desk-based assessment has been undertaken to clarify the archaeological potential of the Site.
- 4.3** This archaeological and heritage assessment concludes that the application site does not contain any world heritage sites, scheduled monuments, registered parks and gardens, or registered battlefields where there would be a presumption in favour of their physical preservation *in situ* and against development.
- 4.4** The Site is not located within an Archaeological Priority Area and there are no non-designated heritage assets located within the Site.
- 4.5** Based on the information within the HER, supplemented by historic mapping the Site has been shown to have a medium to negligible potential for archaeological remains (Section 3.5). The construction of the previous buildings on the Site is considered to have had impacts upon sub-surface deposits, some of which may have had the potential to contain archaeological deposits. The proposed development has the potential to have further effects on archaeological deposits which may survive within parts of the Site. In this instance, this would tend to be beside previous ground disturbance (e.g. adjacent to existing footings) and in areas such as courtyards or lawns, where previous disturbance is lighter.
- 4.6** On the basis of available evidence, it is considered that the proposed development accords with current legislation, the planning policies contained within the NPPF and the policies of the adopted London Plan and Richmond Upon Thames Local Plan.

Sources Consulted

Greater London Historic Environment Record

Primary Sources

1761 Rocque
1804 Ordnance Survey Drawing
1845 Twickenham Tithe Map
1865 OS Map
1896 OS Map
1935 OS Map
1961 OS Map

Secondary Sources

CifA (2017) *Standard and Guidance for historic desk-based assessment*.

Cowie, R. & Eastmond, D. (1997) "An archaeological survey of the foreshore in the Borough of Richmond upon Thames; part 1: time and tide" in *London Archaeologist*, vol 8, no.4, 87-94.

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London Borough of Richmond upon Thames (n.d.) *Twickenham Riverside & Queen's Road Conservation Area Study*.

Internet Sources

British Geological Society online viewer:

www.bgs.ac.uk/data/mapViewers/home.html

Open Domesday:

<http://opendomesday.org/place/TQ1675/isleworth/>

British History Online:

<https://www.british-history.ac.uk/vch/middx/vol3/pp139-147>

5.0

5. Methodology

Archaeological Assessment Methodology

5.1 This report has been produced in accordance with the Standard and Guidance for Historic Environment Desk-Based Assessment issued by the Chartered Institute for Archaeologists (CIfA, 2017). These guidelines provide a national standard for the completion of desk-based assessments.

5.2 The assessment principally involved consultation of readily available archaeological and historical information from documentary and cartographic sources. The major repositories of information comprised:

- Information held by the Greater London Historic Environment Record on known archaeological sites, monuments and findspots within 500m of the Site;
- Maps and documents held online;
- The National Heritage List for England curated by Historic England; and
- Records made during a site visit in November 2018.

5.3 This report provides a synthesis of relevant information for the site derived from a search area extending up to 1km **from its boundary, hereafter known as the 'study area', to allow for additional contextual information regarding its archaeological interest or potential to be gathered.**

5.4 The information gathered from the repositories and sources identified above was checked and augmented through the completion of a site visit and walkover. This walkover considered the nature and significance of known and/or potential archaeological assets within the site, identified visible historic features and assessed possible factors which may affect the survival or condition of known or potential assets.

5.5 The report concludes with (1) an assessment of the **site's likely archaeological potential**, made with regard to current best practice guidelines, and (2) an assessment of the likely effects of the proposed development upon designated and undesignated archaeological assets, whether direct or indirect.

Assessment of Heritage Significance and Importance

5.6 Heritage assets are assessed in terms of their significance and importance, following the requirement in NPPF paragraph 189, and taking account of Historic

England's guidance in *Managing Significance in Decision-Taking in the Historic Environment (GPA2)*. Significance, in relation to heritage policy, is defined by the NPPF as

"the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."

5.7

As noted above, setting is defined in Annex 2 of the NPPF as:

"the surroundings in which an asset is experienced. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral."

5.8

Where potential impacts on the settings of a heritage assets are identified, the **assessment of significance includes 'assessing whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s)',** following Step 2 of the staged approach to setting recommended in Historic England's guidance in The Setting of Heritage Assets (GPA3). Attributes of an **asset's setting which can contribute to its significance are listed on page 9 of GPA3.**

5.9

The importance of a heritage asset is the overall value assigned to it based on its heritage significance, reflecting its statutory designation or, in the case of undesignated assets, the professional judgement of the assessor (Table 1). Historic England guidance also refers to an asset's **'level of significance'** (GPA2, paragraph 10), which in this usage has the same meaning as importance. Nationally and internationally designated assets are assigned to the highest two levels of importance. Grade II Listed Buildings and Grade II Registered Parks & Gardens are considered of medium importance, reflecting the lower level of policy protection provided by the NPPF (paragraph 194). Conservation Areas are not assigned to either level of importance by the NPPF but their status as local designations and their omission from the National Heritage List justifies their classification here as assets of medium importance. Other non-designated assets which are considered of local importance only are assigned to a low level of importance. Following the NPPF (Annex 2), **a historic feature which lacks 'a degree of significance meriting consideration in planning decisions, because of its heritage interest' is not considered to be a heritage asset; it may also be said to have negligible heritage importance.**

Table 1: Criteria for Assessing the Importance of Heritage Assets

Importance of the asset	Criteria
Very high	World Heritage Sites and other assets of equal international importance
High	Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, Registered Battlefields, Grade I and II* Listed Buildings, and undesignated heritage assets of equal importance
Medium	Conservation Areas, Grade II Registered Parks and Gardens, Grade II Listed Buildings, heritage assets on local lists and undesignated assets of equal importance
Low	Undesignated heritage assets of lesser importance

Potential for unknown heritage assets

5.10 Archaeological features are often impossible to identify through desk-based assessment. The likelihood that significant undiscovered heritage assets may be present within the application site is referred to as archaeological potential. Overall levels of potential can be assigned to different landscape zones, following the criteria in Table 2, while recognising that the archaeological potential of any zone will relate to particular historical periods and types of evidence. The following factors are considered in assessing archaeological potential:

- The distribution and character of known archaeological remains in the vicinity, based principally on an appraisal of data in the [HER];

- The history of archaeological fieldwork and research in the surrounding area, which may give an indication of the reliability and completeness of existing records;
- Environmental factors such as geology, topography and soil quality, which would have influenced land-use in the past and can therefore be used to predict the distribution of archaeological remains;
- Land-use factors affecting the survival of archaeological remains, such as ploughing or commercial forestry planting; and
- Factors affecting the visibility of archaeological remains, which may relate to both environment and land-use, such as soils and geology (which may be more or less conducive to formation of cropmarks), arable cultivation (which has potential to show cropmarks and create surface artefact scatters), vegetation, which can conceal upstanding features, and superficial deposits such as peat and alluvium which can mask archaeological features.

5.11 In light of the above, the assessment of heritage significant heritage within Sections 2 and 3 of this report has been prepared in a robust manner, employing current best practice professional guidance and giving due regard to the methodology detailed above.

Table 2: Archaeological potential

Potential	Definition
High	Undiscovered heritage assets of high or medium importance are likely to be present.
Medium	Undiscovered heritage assets of low importance are likely to be present; and it is possible, though unlikely, that assets of high or medium importance may also be present.
Low	The study area may contain undiscovered heritage assets, but these are unlikely to be numerous and are highly unlikely to include assets of high or medium importance.

Negligible	The study area is highly unlikely to contain undiscovered heritage assets of any level of importance.
Nil	There is no possibility of undiscovered heritage assets existing within the study area.

6.0

6. Legislation and Planning Framework

Introduction

- 6.1** This section sets out existing legislation and planning policy, governing the conservation and management of the historic environment, of relevance to this application.
- 6.2** In terms of “*effects on the historic environment*”, the following paragraphs summarise the principal legislative instruments and planning policy framework.

Current Legislation

- 6.3** The relevant legislation concerning the treatment of scheduled monuments is the Ancient Monuments and Archaeological Areas Act 1979 (HMSO 1979).
- 6.4** This act details the designation, care and management of scheduled monuments, as well as detailing the procedures needed to obtain permission for works which would directly impact upon their preservation. The Act does not confer any statutory protection on the setting of scheduled monuments, with this considered as a policy matter in Paragraph 132 of the National Planning Policy Framework (NPPF).
- 6.5** The balancing exercise to be performed – between the harm arising from a proposal and the benefits which would accrue from its implementation – is then subsequently presented in Paragraphs 133 and 134 of the NPPF.

National Planning Policy

- 6.6** The NPPF sets out the government’s approach to the conservation and management of the historic environment, through the planning process, with paragraph 185 of Section 16 emphasising the need for local authorities to set out a clear strategy for the conservation and enjoyment of the historic environment, where heritage assets are recognised as a finite and irreplaceable resource, to be preserved in a manner appropriate to their significance.
- 6.7** Paragraph 184 states that:

"Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance..."

6.8

Paragraph 189 concerns planning applications, stating that:

"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."

6.9

Designated assets are addressed in Paragraphs 193 and 194. Paragraph 193 states that:

"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."

6.10

Paragraph 194 states that:

"Any harm to or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) *grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) *assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."*

6.11

Footnote 63 then goes on to state that:

"Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets."

6.12 With regard to the decision making process, paragraphs 195 and 196 are of relevance. Paragraph 195 states that:

"Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- *the nature of the heritage asset prevents all reasonable uses of the site; and*
- *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- *conservation by grant-funding or some form of non for profit, charitable or public ownership is demonstrably not possible; and*
- *the harm or loss is outweighed by the benefit of bringing the site back into use."*

6.13 Paragraph 196 states that:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use."

6.14 The threshold between substantial and less than substantial harm has been clarified in the courts. Whilst the judgement cited relates specifically to the impact of development proposals on a listed building, Paragraphs 24 and 25 of *Bedford BC v Secretary of State for Communities and Local Government* [2013] EWHC 2847¹⁶ remain of relevance here in the way they outline the assessment of 'harm' for heritage assets:

"What the inspector was saying was that for harm to be substantial, the impact on significance was required to be serious such that very much, if not all, of the significance was drained away."

6.15 Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious damage to the structure of the building. In the context of non-physical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was either "*vitiated altogether [i.e. destroyed] or very much reduced*".

¹⁶ Paragraphs 24 and 25 of *Bedford BC v Secretary of State for Communities and Local Government* [2013] EWHC 2847

6.16 In other words, for the 'harm' to be 'substantial' – and therefore require consideration against the more stringent requirements of Paragraph 195 of the NPPF compared with Paragraph 196; the proposal would need to result in the asset's significance either being:

"vitiating altogether or very much reduced".¹⁷ Quite evidently, this represents a very high threshold to be reached.

6.17 Paragraph 200 advises that:

"Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably."

6.18 With regard to non-designated heritage assets, Paragraph 197 states that:

"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

6.19 Finally, paragraph 199 states that:

"Local planning authorities should require developers to record and advance understanding of the significance of any heritage asset to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publically accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted."

6.20 Footnote 64 then states:

"Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository."

¹⁷ Paragraphs 24 and 25 of *Bedford BC v Secretary of State for Communities and Local Government [2013] EWHC 2847*

Local Policies

London Plan (adopted 2011)

6.21 The London Plan provides the overall strategic plan for London and sets out integrated economic, environmental, transport and social framework for development within London. The following policies are relevant to this assessment:

Policy 7.8 Heritage Assets and Archaeology

Strategic

A London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

B Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

Planning decisions

C Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

D Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

E New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

LDF preparation

F Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.

G Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within there are.

Policy 7.9 Heritage-Led Regeneration

Strategic

A Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, Blue Ribbon Network and public realm.

Planning decisions

B The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality.

LDF Preparation

C Boroughs should support the principles of heritage-led regeneration in LDF policies.

Draft New London Plan

6.22

The Draft New London Plan has been published for consultation. This strategic plan will shape development in London and sets the policy framework for local plans across London. The following policies are relevant to this assessment:

Policy HC1 Heritage Conservation and growth

Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to the heritage assets, landscapes and archaeology within their area.

*Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:
setting out a clear vision that recognises and embeds the role of heritage in place-making utilising the heritage significance of a site or area in the planning and design process integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses*

that contribute to their significance and sense of place delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets. Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

London Borough of Richmond Upon Thames Local Plan (adopted July 2018)

6.23

The Local Plan was adopted in July 2018 and supersedes all previous planning documents in the London Borough of Richmond. It sets out policies and guidance for development within the Borough for the next 15 years and identifies where main development will take place. One of the Local Plan Strategic Vision and Objectives relates to protection of local character, including the historic environment:

Villages and historic environment

The borough's villages and their special and distinctive characters will have been protected, with each being unique, recognisable and important to the community and to the character of the borough as a whole. They will continue to maintain and enhance their distinctiveness in terms of the community, facilities and local character. Heritage assets including listed buildings and Conservation Areas, historic parks as well as Royal Botanic Gardens, Kew World Heritage Site, which contribute so significantly to the character of this borough, will have been protected and enhanced.

Protecting Local Character

- 1. Maintain and enhance the borough's attractive villages, including the unique, distinctive and recognisable local characters of the different village areas and their sub-areas.*
- 2. Protect and, where possible, enhance the environment including the heritage assets, retain and improve the character and appearance of established residential areas, and ensure new development and public spaces are of high quality design.*
- 3. Protect and improve the borough's parks and open spaces to provide a high quality environment for local communities and provide a balance between areas for quiet enjoyment and wildlife and areas to be used for sports, games and recreation.*
- 4. Protect and enhance the borough's network of green infrastructure that performs a wide range of functions for residents, visitors, biodiversity and the economy.*
- 5. Protect and enhance the borough's biodiversity, including trees and landscape, both within open spaces but also within the built environment and along wildlife corridors.*
- 6. Protect and improve the unique environment of the borough's rivers, especially the River Thames and its tributaries as wildlife corridors, as opportunities for recreation and river transport where possible, increasing access to and alongside the rivers where appropriate, and gain wider local community benefits when sites are redeveloped.*

6.24

The following policies relate to the historic environment and this assessment:

Policy LP4: Non-designated Heritage Assets

The Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit, memorials, particularly war memorials, and other local historic features.

There will be a presumption against the demolition of Buildings of Townscape Merit.

Policy LP 7: Archaeology

The Council will seek to protect, enhance and promote its archaeological heritage (both above and below ground), and will encourage its interpretation and presentation to the public. It will take the necessary measures required to safeguard the archaeological remains found, and refuse planning permission where proposals would adversely affect archaeological remains or their setting.

Desk based assessments and, where necessary, archaeological field evaluation will be required before development proposals are determined, where development is proposed on sites of archaeological significance or potential significance.

6.25 The above Acts, Regulations, plans and policies have been taken into account in the preparation of this assessment.

7.0

7. Appendix 1 – Site Location

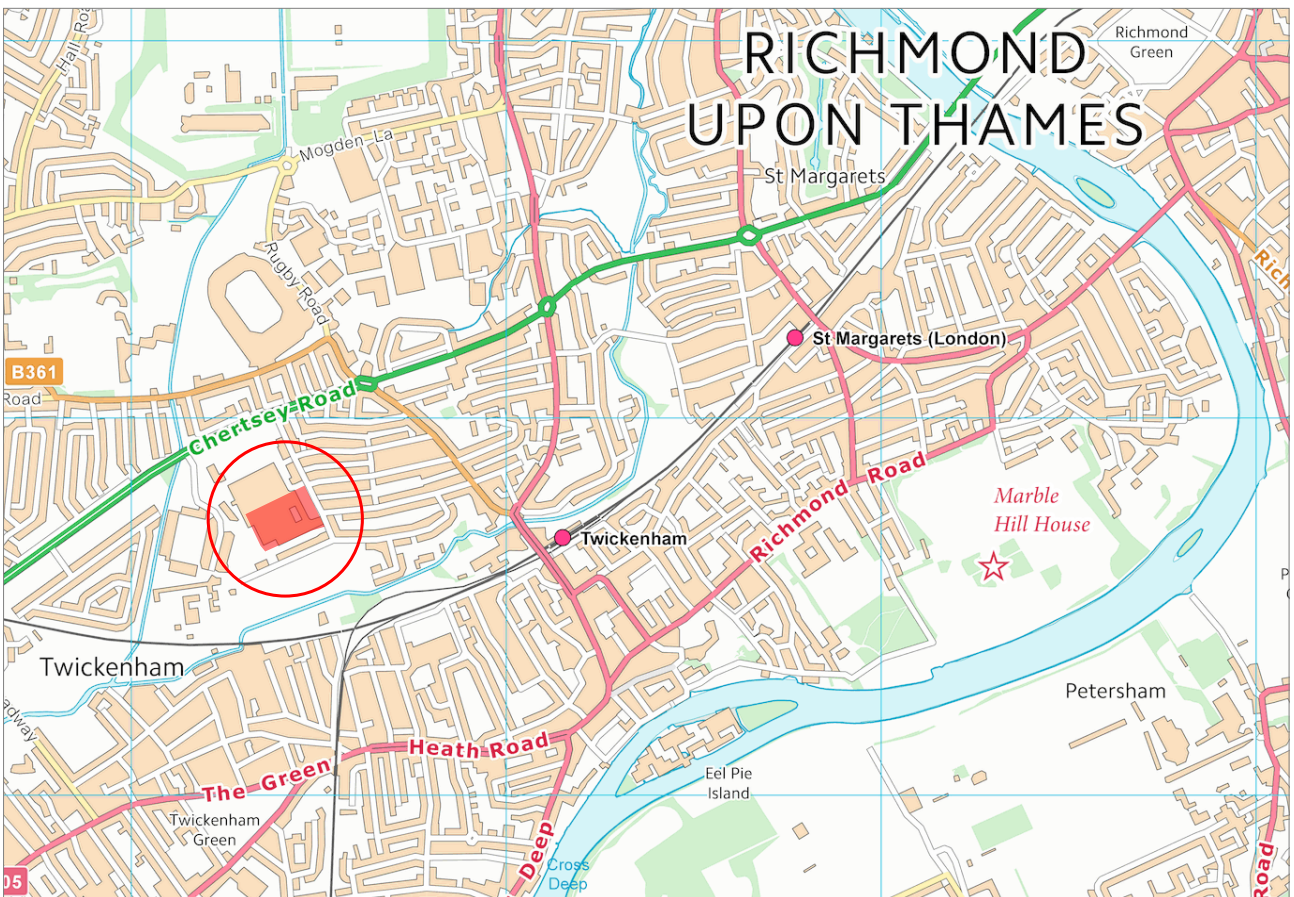
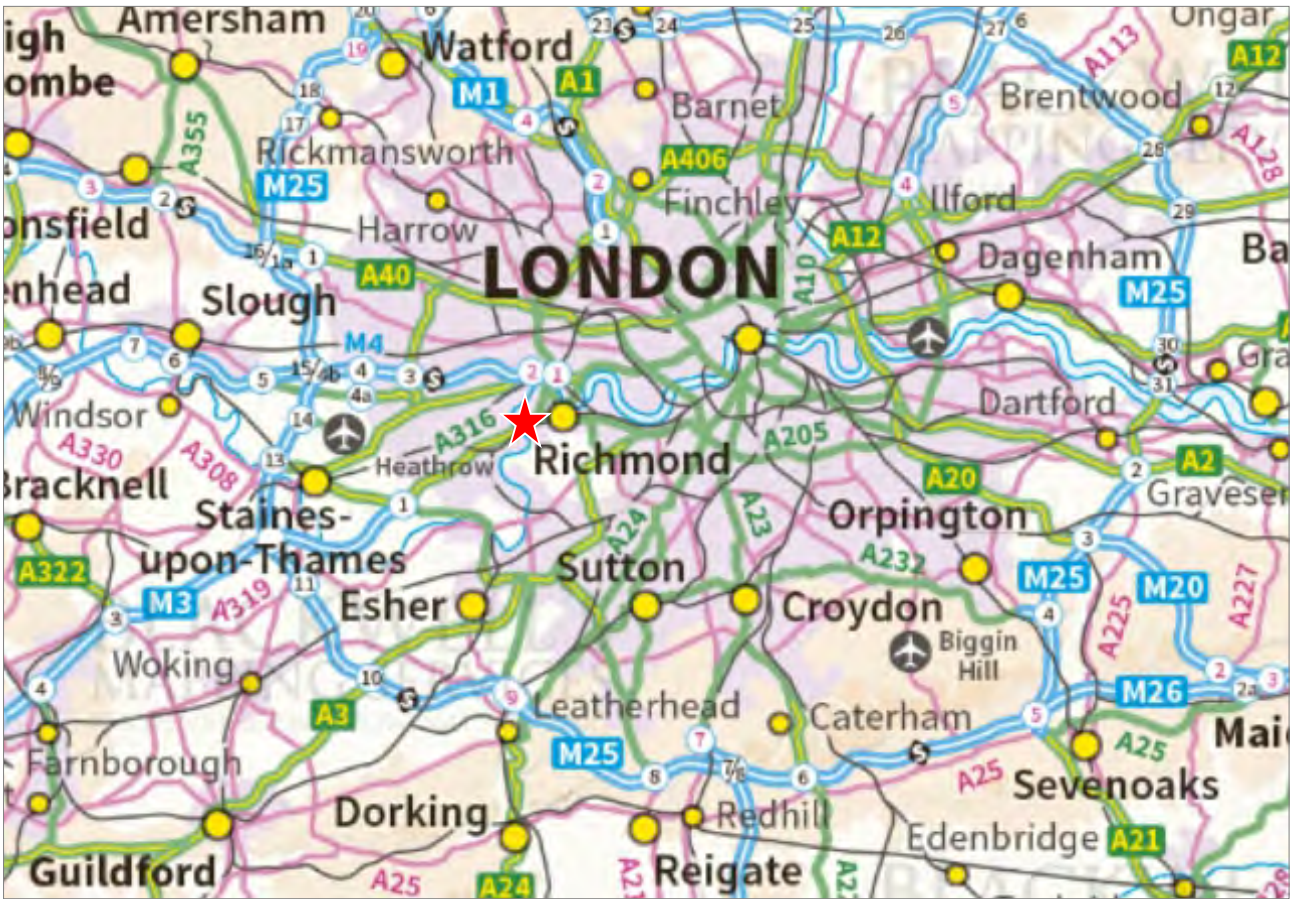
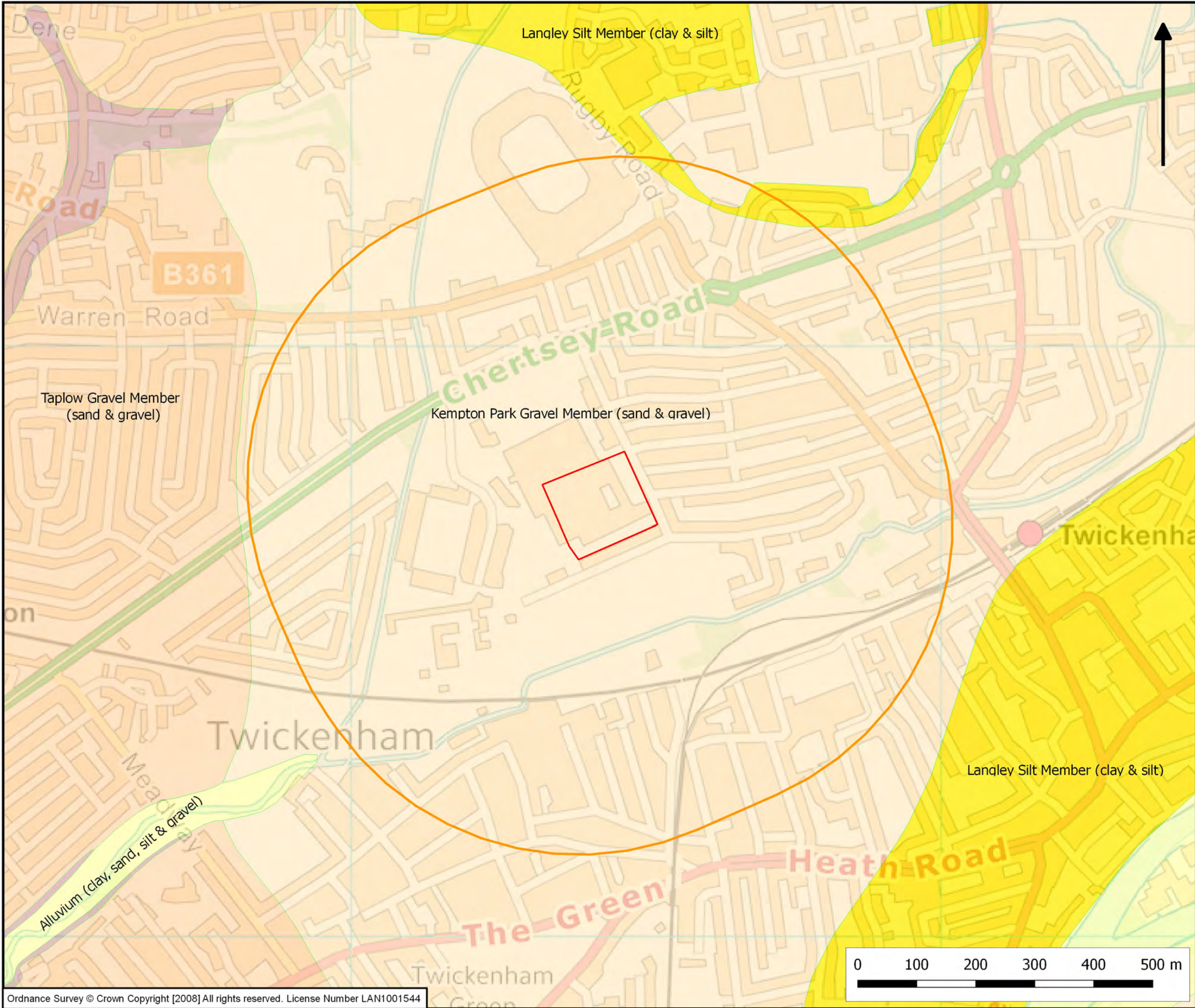


Figure 1: Site Location

8.0

8. Appendix 2 – Geology and Topography



Legend

- Application Site
- 500m Study Area

Site Name:
Richmond-upon-Thames College
Redevelopment

Scale:
1:6,000

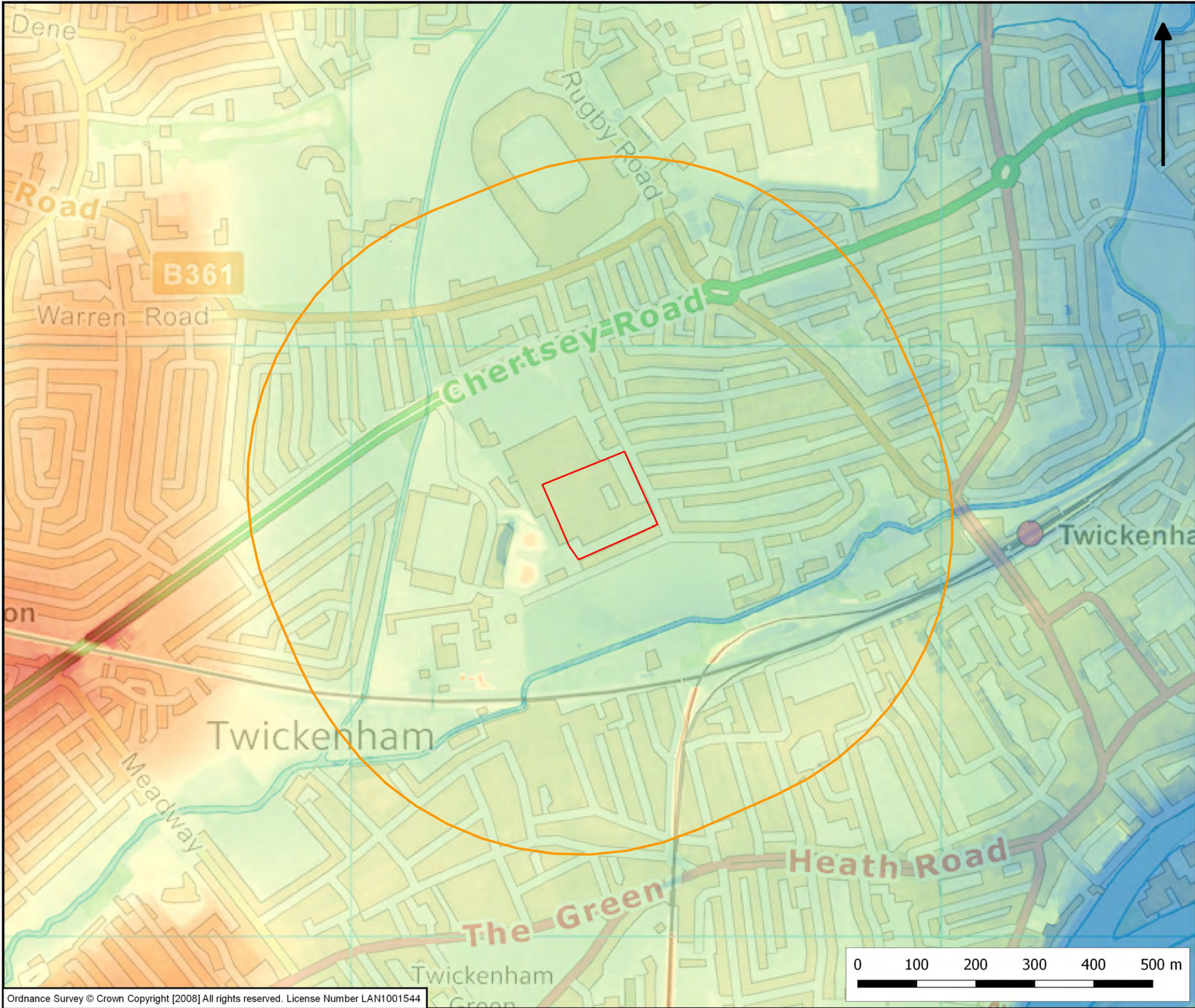
On Behalf of:
CLARION HOUSING GROUP LTD.

Archaeology
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Figure 2:
Superficial Geology

Date:
November 2018

Revision:
v.1



Legend

- Application Site
- 500m Study Area

Height (metres AOD)

- 5
- 8.75
- 12.5
- 16.25
- 20

Site Name:
 Richmond-upon-Thames College
 Redevelopment

Scale:
 1:6,000

On Behalf of:
CLARION HOUSING GROUP LTD.

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Figure 3:
 Topography

Date: November 2018	Revision: v.1
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9.0

9. Appendix 3 – Historic Environment Record